

# EXHIBIT B

THE UNITED STATES SECURITIES AND EXCHANGE COMMISSION

In the Matter of: )  
 ) File No. SL-02623-A  
AMERICAN PENSION SERVICES, INC. )

WITNESS: Judson Pitts

PAGES: 1 through 170

PLACE: Securities and Exchange Commission  
15 West South Temple, Suite 1800  
Salt Lake City, Utah 84101

DATE: Tuesday, April 1, 2014

The above entitled matter came on for hearing,  
pursuant to notice, at 9:40 a.m.

Diversified Reporting Services, Inc.

(202) 467 9200

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1 APPEARANCES:  
 2  
 3 On behalf of the Securities and Exchange Commission:  
 4 SCOTT FROST, ESQ.  
 5 CHERYL M. MORI, ESQ.  
 6 PAUL N. FEINDT, ESQ.  
 7 Securities and Exchange Commission  
 8 Division of Enforcement  
 9 15 West South Temple, Suite 1800  
 10 Salt Lake City, Utah 84101  
 11  
 12 On behalf of the Witness:  
 13 MAX D. WHEELER, ESQ.  
 14 Snow, Christensen & Martineau  
 15 10 Exchange Place, Eleventh Floor  
 16 Salt Lake City, Utah 84111  
 17  
 18 ALSO PRESENT:  
 19 Alex Avery, Law Clerk  
 20  
 21  
 22  
 23  
 24  
 25

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1 PROCEEDINGS  
 2 MR. MORI: We're on the record at  
 3 9:40 a.m. on April 1st, 2014.  
 4 Would you please raise your right hand.  
 5 Do you solemnly swear to tell the truth, the whole  
 6 truth and nothing but the truth?  
 7 THE WITNESS: Yes.  
 8 Whereupon.  
 9 JUDSON PITTS  
 10 was called as a witness and, having been first duly  
 11 sworn, was examined and testified as follows:  
 12 EXAMINATION  
 13 BY MS. MORI:  
 14 Q Please state and spell your full name for  
 15 the record.  
 16 A It's Judson, J-u-d-s-o-n, Tolman,  
 17 T-o-l-m-a-n, Pitts, P-i-t-t-s.  
 18 Q I'm Cheryl Mori. With me today is Scott  
 19 Frost, Paul Feindt. We're officers of the  
 20 Securities and Exchange Commission for purposes of  
 21 this proceeding. Also with us is Alex Avery, who's  
 22 a law clerk, if that's okay with you.  
 23 THE WITNESS: Uh-huh (affirmative).  
 24 MS. MORI: This is an investigation by the  
 25 United States Securities and Exchange Commission in

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1 the matter of American Pension Services, Inc.,  
 2 SL-2623 to determine whether there have been  
 3 violations of certain provisions of the federal  
 4 securities laws. The facts developed in this  
 5 investigation, however, might constitute violations  
 6 of other federal or state civil or criminal laws.  
 7 Prior to the opening of the record you  
 8 were provided with a copy of the Formal Order of  
 9 Investigation in this matter. It will be available  
 10 for your examination during the course of this  
 11 proceeding. Have you had an opportunity to review  
 12 the Formal Order?  
 13 A I have.  
 14 Q Prior to the opening of the record you  
 15 were provided with a copy of the Commission's  
 16 Supplemental Information Form. A copy of that  
 17 notice has been marked as Government Exhibit 1.  
 18 Have you had the opportunity to read Exhibit 1?  
 19 A Yes, I have.  
 20 Q Do you have any questions concerning this  
 21 notice?  
 22 A Not at this time.  
 23 Q And Mr. Pitts, are you represented by  
 24 counsel today?  
 25 A I am.

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<p>1 Initially it was contemplated then that 2 for the first six or seven months of 2013, my only 3 jobs with American Pension Services would be helping 4 with litigation that I was already working on. We 5 had a trial in the matter of Jeannine Reneau in 6 February of 2013. I was named as a defendant in 7 that lawsuit, inasmuch as I had served as a trustee, 8 a foreclosing trustee, and I was also helping 9 American Pension Services to get the proper 10 information and trial preparation that was needed to 11 their attorneys at that time to prepare for that 12 trial.</p> <p>13 Since that trial, I also helped to write 14 and file an appeal in that case to the Court of 15 Appeals, which has taken a tremendous amount of 16 time. And inasmuch as I was cleared at that trial 17 and was dropped from the trial at the trial, then it 18 cleared a way for me, on conflicts, to go ahead and 19 then take over as a corepresentative for American 20 Pension Services in the APS lawsuits. So that took 21 up a considerable amount of time. I'd say there's 22 another three or four lawsuits that I handle as 23 outside counsel that are still proceeding at this 24 time for American Pension Services, and I manage and 25 handle those.</p>	<p>1 A It's all been litigation or this 2 investigation, that's correct. And I have learned a 3 great deal more about IRA law, securities law, other 4 things as I have participated in this investigation.</p> <p>5 Q So prior to you going in-house, you didn't 6 have any IRA-type experience as far as knowledge of 7 regulations and laws?</p> <p>8 A That's correct.</p> <p>9 Q You said you also represent APS 401(k). Is 10 that -- are you in-house for APS 401(k) as well?</p> <p>11 A Yes. APS 401(k) is also at the same 12 office where I am. Jim Allfrey, as we've said 13 before, is the president or is the managing 14 president of APS 401(k) Services, and he has given 15 me the permission and authority to represent them in 16 this matter.</p> <p>17 Q Do you do other in-house work for them or 18 is that just as you represent them?</p> <p>19 A It's only been for this matter.</p> <p>20 Q But you consider that you're in-house?</p> <p>21 A Yeah. If they needed something from me, 22 they would come to me and ask me to provide legal 23 research, legal support. I'll be honest, I have not 24 been approached by 401(k) Services in the year and 25 three months that I've been employed at the office</p>
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<p>1 I also oversee Mr. Becker. Mr. Becker, in 2 his capacity as secretary of the corporation I do 3 not oversee, but in his capacity of doing any legal 4 work, he could be construed as a paralegal to me, 5 and I give him assignments from time to time for 6 research and other things to do on cases, or we'll 7 have him communicate on my behalf with other 8 attorneys that are working for APS on various 9 litigation cases.</p> <p>10 Q Okay. And as in-house counsel, was it 11 contemplated that you would start doing more of the 12 compliance-type work or move into that area?</p> <p>13 A I think it was discussed that eventually 14 that's what it would turn in to. Mr. DeYoung has a 15 vast amount of knowledge about securities issues. 16 Well, I wouldn't say securities issues, I'd say IRA 17 issues, retirement issues. And over time I think 18 that that's what they'd like me to do, is to learn 19 more about the securities laws, learn more about IRA 20 law, learn more about retirement law, and be able to 21 provide them with feedback on those issues. But at 22 this time I haven't done anything other than what's 23 been related to this investigation.</p> <p>24 Q So it's all been litigation or this 25 investigation?</p>	<p>1 to actually do any work for them other than this 2 investigation.</p> <p>3 Q Now, so when you do work for APS 401(k), 4 that's just included in your salary, then, the 5 salary that you get from APS?</p> <p>6 A Yeah, it would be contemplated as such.</p> <p>7 Q Can you explain the structure of APS, the 8 business structure?</p> <p>9 A The way that it's been explained to me, 10 the way that I understand it, is that American 11 Pension Services is a corporation, allegedly a C 12 corporation. Mr. DeYoung is the only shareholder or 13 stockholder of the corporation, as well as the 14 president, and he has hired a number of corporate 15 officers to help him, assist him in what he needs to 16 do. In reality, Mr. DeYoung, for the most part, 17 controls the entire company.</p> <p>18 Q Who are the other corporate officers?</p> <p>19 A Mr. DeYoung is the secretary -- I'm sorry 20 -- Mr. Becker is the secretary. Mr. DeYoung is the 21 president. I thought for a while that Mrs. DeYoung 22 was an officer, but I've been told that she's not, 23 and I can't remember. I did look at the corporation 24 resolution recently in a case, but I can't remember 25 from that whether she is or not off the top of my</p>

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1 head. I know Mr. Smith is not and Mr. Allfrey may  
 2 be the vice president of American Pension Services,  
 3 Inc.  
 4 Q So when you say you've been told that, who  
 5 told you that?  
 6 A Mr. DeYoung.  
 7 Q Is there a chain of command at APS? I  
 8 know you said that Mr. DeYoung essentially controls  
 9 it. Are there other managers?  
 10 A The day-to-day operations of American  
 11 Pension Services, as a corporation, including  
 12 supervision of the employees and dealing with any  
 13 day-to-day legal issues that might arise usually  
 14 runs through Michelle DeYoung, and I report directly  
 15 to her and work on those issues with her. The  
 16 litigation that takes place runs through Mr. DeYoung  
 17 and I report directly to him regarding all work that  
 18 I do on litigation matters.  
 19 Q So you report to Michelle DeYoung?  
 20 A I report to both of them. It took me a  
 21 while to figure out how to finesse that.  
 22 Q Any other managers that have any kind of  
 23 decision-making ability?  
 24 A No, not really.  
 25 Q What's Michelle DeYoung's background?

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1 A I don't know. I haven't had a discussion  
 2 about her background with her.  
 3 Q Do you know whether she has any college  
 4 education or any other kind of training?  
 5 A I don't. The only thing I know about her  
 6 is that she was brought into the office as an  
 7 employee with the office in 2008.  
 8 Q And she's full time there; is that  
 9 correct?  
 10 A She has been since that time.  
 11 Q And what about the business structure of  
 12 APS? And if I say "APS 401(k)," I mean --  
 13 A I understand.  
 14 Q -- APS 401(k) Services.  
 15 A I understand.  
 16 Q What's the structure of that entity?  
 17 A My understanding is that Jim is the  
 18 president of the company, and he has an employee  
 19 that works with him. Her name is Megan, and she  
 20 helps him on, you know, any matters that come up. I  
 21 know -- I don't know who the officers are. I've  
 22 never looked at the corporate resolution for APS  
 23 401(k) Services.  
 24 There is a feeling in the office that it  
 25 is separate and distinct. Jim's office is down the

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1 hall. It is separate. They kind of do their own  
 2 stuff there. They run their own seminars where they  
 3 educate about APS 401(k) Services. They do things  
 4 kind of on their own. And so for the most part,  
 5 it's kind of an isolated part of the office. The  
 6 rest of the office is involved in the day-to-day  
 7 operation of APS, Inc.  
 8 Q So just Jim and Megan?  
 9 A Those are the only two that, on a  
 10 day-to-day basis, really work with that.  
 11 Q And what about the computer systems? Are  
 12 they shared computer systems? APS and 401(k).  
 13 A I don't know the answer to that question.  
 14 I know that there's a server room. I don't know if  
 15 the two different companies are on two different  
 16 servers. I do believe that APS 401(k) Services  
 17 likely has access to the APS mainframe, but I don't  
 18 know that for sure.  
 19 Q And who pays Jim Allfrey and Megan?  
 20 A I don't know.  
 21 Q When was APS 401(k) started?  
 22 A I don't know the answer to that.  
 23 Q Do you know why it was started?  
 24 A No.  
 25 Q Does APS have any other office space

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1 besides the one in Riverton?  
 2 A No.  
 3 Q Does it conduct business other than at the  
 4 Riverton offices?  
 5 A Not that I'm aware of.  
 6 Q What about APS 401(k)?  
 7 A The same. I'm not aware that they operate  
 8 out of any other office or that they have another  
 9 location.  
 10 Q Does APS maintain any business records or  
 11 assets anywhere other than at Riverton?  
 12 A Yes, but I don't know where.  
 13 Q And what is it that's maintained  
 14 elsewhere?  
 15 A Probably files. I mean, when I say -- the  
 16 only reason I know this is because I've asked for  
 17 copies of files at certain times, which are older  
 18 files that may be archived, and those are in storage  
 19 somewhere. I don't know where.  
 20 Q What about assets, any assets or property  
 21 that APS owns?  
 22 A Not that I'm aware of. Well, are we  
 23 talking...  
 24 MR. WHEELER: Let me caution you that any  
 25 information that comes from your client is protected

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1 that, and we'll have to -- if it's a really big  
2 deal, we'll have to go out and hire an attorney to  
3 address the question, and if it's not a big deal,  
4 then we'll have to handle it otherwise in-house.

5 **Q So then you do perform some in-house  
6 duties as they arise? You're available there?**

7 **A** I'm available and I have done a few of  
8 those over time, but again, it's probably  
9 infrequent. I mean, the questions come up every once  
10 in a while, maybe two or three times a month at  
11 most.

12 **Q You mentioned Julie Hansen is also an  
13 employee of APS?**

14 **A** She is, yes.

15 **Q And what does she do?**

16 **A** I didn't mention her, but that's all  
17 right. Julie Hansen is there. She -- that's a good  
18 question. She handles a lot of the incoming phone  
19 calls and deals directly with clients in kind of a  
20 face-to-face.

21 **Q How many phone calls? Like, what's a call  
22 volume coming into APS of clients? Any idea?**

23 **A** I don't know.

24 **Q Does she spend most of her time on the  
25 phone if she's the one answering or does she have**

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1 receives incoming checks, and she processes those.  
2 I think she gives those to Nannette, who then does  
3 most of the work to input and reconcile, you know,  
4 balances and money coming in, coming out. Marie  
5 DeYoung is another employee, and she does daily  
6 bookkeeping for LaMont.

7 **Q Is she related to Curtis DeYoung?**

8 **A** Yes.

9 **Q How is she related?**

10 **A** She's his mother.

11 **Q Does she work there full time?**

12 **A** I don't know.

13 **Q Okay, other employees?**

14 **A** A receptionist by the name of Nicole. I  
15 do not know Nicole's last name.

16 **Q So she's the one that actually answers  
17 incoming phones and then she would transfer them  
18 to --**

19 **A** She does, and she greets people at the  
20 desk. She mostly handles the mail.

21 **Q So when you say Julie Hansen handles  
22 incoming calls, that's just from the receptionist,  
23 who would transfer it?**

24 **A** Sometimes. I think -- I mean, from what  
25 I've observed, they tag-team it. I think she's

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1 other duties, too?

2 **A** That's a good question. I don't know. I  
3 don't know the proportion. I don't know, you know,  
4 how that's split. I can't even -- I don't even know  
5 whether I can say that she opens new accounts.

6 **Q Okay, and who are the other employees?**

7 **A** Chris Dalton.

8 **Q And is it she?**

9 **A** It's a she.

10 **Q What does she do?**

11 **A** And she closes accounts. That's her  
12 primary.

13 **Q And Michelle, Julie and Chris are all APS  
14 employees, not 401(k)? Or do you know?**

15 **A** I don't know.

16 **Q Who else?**

17 **A** Nannette, and I want to say her last name  
18 is, like -- starts with a Z. It's, like, Zilstrow  
19 or Zastrow. Nannette does most of the day-to-day  
20 input of incoming -- well, reconciling checks and  
21 outgoing things. She works with LaMont on some of  
22 those things, is my understanding.

23 **Q So is she the one that receives the  
24 checks?**

25 **A** No, I think Kerry is the one that actually

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1 probably supposed to answer most of the incoming  
2 calls, but I think Julie picks up a lot of the time  
3 when she's busy with the mail or other just front,  
4 administrative tasks.

5 **Q And do you know whether she's an employee  
6 of APS or 401(k)?**

7 **A** I don't know her status.

8 **Q You mentioned Jim Allfrey.**

9 **A** Uh-huh (affirmative).

10 **Q Does he do any work for APS?**

11 **A** I don't know.

12 **Q And you don't know how he gets paid or  
13 what entity pays him?**

14 **A** I don't.

15 **Q And you mentioned Megan works with Jim?**

16 **A** Uh-huh (affirmative).

17 **Q Does she only do work for APS 401(k); do  
18 you know?**

19 **A** I don't know. I believe so, but I don't  
20 know for sure.

21 **Q And who else are the other employees?**

22 **A** Candace DeYoung.

23 **Q Is she related to Curtis?**

24 **A** Yes. She's his daughter.

25 **Q What does she do?**

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<p>1 far as the business accounting?</p> <p>2 A Payroll.</p> <p>3 Q He does payroll?</p> <p>4 A Uh-huh (affirmative).</p> <p>5 Q And who does the accounting for the</p> <p>6 business? The QuickBooks, the general ledgers, that</p> <p>7 type thing.</p> <p>8 A Well, Marie DeYoung does the ledgers.</p> <p>9 Nannette does the processing. LaMont, my</p> <p>10 understanding is LaMont follows up on those to make</p> <p>11 sure that they're correct.</p> <p>12 Q So Marie DeYoung is the one that actually</p> <p>13 is entering the data into the QuickBooks; is that</p> <p>14 right?</p> <p>15 A Well, yeah. I don't know that -- I don't</p> <p>16 think it's QuickBooks. I mean, my understanding is</p> <p>17 that the APS system is not QuickBooks.</p> <p>18 Q So do you know who does input for</p> <p>19 QuickBooks?</p> <p>20 A No, I don't.</p> <p>21 Q And when you say APS system is not on</p> <p>22 QuickBooks, can you explain what you mean by that?</p> <p>23 A I just mean that the APS mainframe</p> <p>24 computer system where any transactions that are</p> <p>25 entered as to clients.</p>	<p>1 case?</p> <p>2 A We did not have any conversations.</p> <p>3 Q Previously you've told us that APS is</p> <p>4 regulated, has a lot of government rules and</p> <p>5 regulations that it must follow. Can you just</p> <p>6 explain that a little bit about who regulates APS</p> <p>7 and APS 401(k)?</p> <p>8 A Before this investigation started I didn't</p> <p>9 have any role in that, so I didn't know much about</p> <p>10 the regulations. As this investigation started to</p> <p>11 take place, I started to ask questions from Mr.</p> <p>12 DeYoung, and he guided me to a number of Department</p> <p>13 of Labor regulations. So I started to read up on</p> <p>14 those and started to get familiar with regulations</p> <p>15 from the Department of Labor, also regulations from</p> <p>16 the Internal Revenue Service.</p> <p>17 I haven't gotten into any great detail</p> <p>18 about a lot of those regulations enough to provide</p> <p>19 and consult with and produce some memoranda in this</p> <p>20 case. But other than that, I haven't gone into any</p> <p>21 great detail. So I know that the Department of</p> <p>22 Labor has audited American Pension Services in the</p> <p>23 past and that they are looking for primarily</p> <p>24 policies and procedures that are taught to employees</p> <p>25 about how to handle calls, not give legal advice,</p>
<p style="text-align: center;">Page 51</p> <p>1 Q So when you're talking about all the data</p> <p>2 entry and processing checks, that's on the APS</p> <p>3 mainframe computer system? Or is that QuickBooks or</p> <p>4 another system?</p> <p>5 A No, I think that's the APS system.</p> <p>6 Q And is LaMont Smith an employee of APS?</p> <p>7 A Yes, LaMont is an employee. I believe</p> <p>8 he's a contracted employee.</p> <p>9 Q Does he get paid through regular payroll</p> <p>10 or a W-2?</p> <p>11 A I do not know. I've been told that he's a</p> <p>12 1099 employee.</p> <p>13 Q And who told you that?</p> <p>14 A He did.</p> <p>15 MS. MORI: Shall we take a break? We've</p> <p>16 been going for a while, all right?</p> <p>17 MR. WHEELER: Sure.</p> <p>18 MS. MORI: We're going to go off the</p> <p>19 record at 10:42 a.m.</p> <p>20 (Recess 10:42 to 10:55)</p> <p>21 MS. MORI: We're back on the record at</p> <p>22 10:55 a.m.</p> <p>23 BY MS. MORI:</p> <p>24 Q And Mr. Pitts, while we were off the</p> <p>25 record, did we have any conversations about the</p>	<p style="text-align: center;">Page 53</p> <p>1 those types of things, is my understanding. But off</p> <p>2 the top of my head, no, there's not a lot more</p> <p>3 detail I can provide than that.</p> <p>4 In terms of the Internal Revenue Service,</p> <p>5 as an administrator we need to provide statements</p> <p>6 and we need to provide the fair market valuations</p> <p>7 each year that are reported to the Internal Revenue</p> <p>8 Service. And all those issues are primarily handled</p> <p>9 by Ms. DeYoung.</p> <p>10 Q By who?</p> <p>11 A Michelle DeYoung.</p> <p>12 Q Michelle?</p> <p>13 A She prepares all of the tax statements and</p> <p>14 those types of things, the fair market valuations.</p> <p>15 Q Anything else?</p> <p>16 A Not that I'm aware of right now.</p> <p>17 Q Any other agencies that regulate APS or</p> <p>18 APS 401(k)?</p> <p>19 A Not that I've discussed with them.</p> <p>20 Q What about the State? Do they regulate?</p> <p>21 A Not that I'm aware of.</p> <p>22 Q So what are the regulations that the DOL</p> <p>23 and the IRS follow? Who pointed you to those? Was</p> <p>24 it Curtis or someone else?</p> <p>25 A Yes, Curtis DeYoung.</p>

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1 therefore, my interpretation of this contract can  
2 only go so far as to what the terms are defined in  
3 the contract itself.

4 **Q Okay, and what's your interpretation of**  
5 **"IRA account owner"?** Is that APS or is that the  
6 **client?**

7 A It's exactly what it says in 1.5 below,  
8 which is directed -- the holder of the self-directed  
9 IRA.

10 **Q So the beneficial owner or holder, so that**  
11 **sounds like it would be the client, to me.**

12 A I would assume so. Your guess is as good  
13 as mine.

14 **Q Has APS established any bank accounts in**  
15 **the name of IRA account owners?**

16 A My understanding is that they do, yeah.

17 **Q And what about for the clients that have**  
18 **assets in the master trust account? Do they have**  
19 **separate bank accounts?**

20 A I don't know.

21 **Q And article 1.3: "Custodial agreement**  
22 **shall mean IRS form 5305-A or other equivalent**  
23 **agreement." Are you familiar with form 5305-A?**

24 A Not really. I may have reviewed it  
25 before, but not intimately.

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1 were used to form a relationship between the client  
2 and the bank. Other than that, I don't know.

3 **Q And when you say it should be obtained**  
4 **from the client, why is that?**

5 A My understanding -- and it's a limited  
6 understanding -- is that anytime that we as an  
7 administrator set up a new account with a client,  
8 and that account, the client is going to put any of  
9 their funds on deposit with the bank with us, that  
10 they need to have some kind of a document that  
11 evidences that relationship with the custodian.

12 **Q And is that an IRS requirement or other**  
13 **requirement?**

14 A I don't know.

15 **Q And that was Michelle DeYoung that told**  
16 **you that?**

17 A I believe so.

18 **Q And what happens with these forms when**  
19 **they're filled out by clients?**

20 A I don't know.

21 **Q If you look on the second page, it shows a**  
22 **line for the depositor's signature and a custodian's**  
23 **signature. Is APS the custodian?**

24 A Not to my knowledge.

25 **Q So who would sign these?**

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1 (SEC Exhibit No. 75 was  
2 marked for identification.)

3 **Q I'm showing you what has been marked as**  
4 **Exhibit 5305 -- or I'm sorry -- Exhibit 75, and it's**  
5 **IRA form 5305-A, titled "Traditional Individual**  
6 **Retirement Custodial Account." Have you ever seen a**  
7 **copy of this document?**

8 A I've seen it.

9 **Q And do you know whether APS uses any other**  
10 **agreement other than form 5305-A as a custodial**  
11 **agreement?**

12 A I don't know.

13 **Q And do you know whether APS uses 5305-A**  
14 **with its clients?**

15 A No, I don't know.

16 **Q Do you know whether every IRA client has**  
17 **to sign one of these custodial agreements?**

18 A I know that they should. I don't know if  
19 they do.

20 **Q And what do you mean, "they should"?**

21 A I know that this document is required to  
22 have the deposit, or who deposits money with the  
23 bank. In other words, I know that this document was  
24 provided to me by Michelle DeYoung at some point,  
25 and that we had a conversation about the fact these

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1 A I don't know.

2 **Q Does APS arrange for this agreement with**  
3 **the client or does it -- do APS clients have**  
4 **interaction with the bank that it's offering?**

5 A I don't know the answer to that question.

6 **Q Have you seen these forms in client**  
7 **account files?**

8 A I can't remember if I have or not. It  
9 occurs to me that I've seen one, at least, before in  
10 a client file, but I can't say for sure.

11 **Q And in Article 1.6 it states that the bank**  
12 **is a passive holder.**

13 MR. WHEELER: Are we back to Exhibit 18  
14 now?

15 MS. MORI: Oh, I'm sorry. Back to Exhibit  
16 18.

17 BY MS. MORI:

18 **Q "The 'passive holder' shall mean the bank**  
19 **whose sole responsibilities with respect to**  
20 **non-monetary assets shall be limited to permitting**  
21 **the administrator to rent and use one or more of the**  
22 **bank's safety deposit boxes."**

23 **Can you explain that?**

24 A No, not really. I mean, I think I did  
25 talk about it earlier. Other than what's expressly